

# NMR Herd Companion Privacy Policy



Please read this privacy notice carefully as it sets out how National Milk Records Ltd (“NMR”) uses your personal information. If you have any questions about this privacy notice or do not agree with it, please contact us at [customerservices@nmrp.com](mailto:customerservices@nmrp.com) or on 03330 043 043 before using this website. Our websites terms of use explain the terms on which you are allowed to use our websites, which provide gateways to our services, as well as lots of other useful information.

NMR is registered as a 'Data Controller' on the public Register of Data Controllers as maintained by the UK's Information Commissioner.

## Introduction

National Milk Records Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. Important information
2. The data we collect about you
3. How is your personal data collected
4. How we use your personal data
5. Disclosures of your personal data
7. Data Security
8. Data Retention
9. Your legal rights
10. Glossary

## 1. Important information

### Purpose of this privacy notice

This privacy notice aims to give you information on how National Milk Records Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to any of our newsletters, purchase a product or service or take part in a competition.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## Controller

National Milk Records Ltd is the controller and responsible for your personal data collectively referred to as "Company", "we", "us" or "our" in this privacy notice.

We have a data controller who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, please contact the Data Controller using the details set out below.

## Contact details

Full name of legal entity: National Milk Records Ltd

Name or title of Data Controller: Mark Frankcom, Finance Director

Email address: [markfr@nmrp.co.uk](mailto:markfr@nmrp.co.uk)

Postal address: Unit 4, Fox Talbot House, Bellinger Close, Chippenham,  
SN15 1BN

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25<sup>th</sup> May 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, and feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you; - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see the cookie policy on our website.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

(i) analytics providers such as Google based outside the EU;

(ii) advertising networks based inside or outside the EU; and

(iii) search information providers based inside or outside the EU.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services Inside or outside the EU;
- Identity and Contact Data from data brokers or aggregators based inside or outside the EU
- Identity and Contact Data from publicly available sources based inside or outside the EU

#### 4. How we use your personal data

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> <li>(f) Technical</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> <li>(a) Technical</li> <li>(b) Usage</li> </ul>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> <li>(e) Profile</li> </ul>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside National Milk Records Ltd for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting our customer services department or using the appropriate website opt outs.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy on our website.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact customer services.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties.
- External Third Parties.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

We do not transfer your personal data outside the European Economic Area (**EEA**).

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Our external websites are tested using independent penetration testing providers, validating against SQL injection, DDOS and other such threats. As an aside, all hardware used for data storage and information provision has appropriate anti-virus and anti-malware protection in place.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of data retention are available in our retention policy.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- a) **Request access**
- b) **Request correction**
- c) **Request erasure**
- d) **Object to processing**
- e) **Request the restriction of processing**
- f) **Request the transfer**
- g) **Withdraw consent at any time**

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the appropriate customer services department.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **Lawful Basis**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **Third Parties**

#### **External Third Parties**

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including vets, nutritionists, industry consultants, lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances. **Your legal rights**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.



**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## Cookie Policy

We use cookies on our website, which amongst other things, help us to improve your experience of our website and to ensure that it performs as you expect it to. Cookies are text files containing small amounts of information, which are downloaded to your computer or mobile device by websites that you visit. They can improve your experience of using a website, for example, by remembering your preference settings and tracking your use of a website so that it can be improved to meet your needs.

Websites must get consent to send cookies to your computer or mobile device unless the cookies are strictly necessary to provide services to you.

You can set your cookie preferences via the cookie banner at the bottom of the site, when you arrive at the website.

Unless the cookie is a strictly necessary cookie, you can withdraw your consent to our cookies at any time even if you have previously consented. Although please do remember that if you do not consent to our functionality cookies, parts of our website will not work.

The table below explains what cookies we use on our website, why we use them and whether they are strictly necessary or another type of cookie e.g. "functionality" or "performance" cookies. We also state in the table whether a cookie is a "persistent" or "session" cookie.

The difference is that:

- Persistent cookies remain on your device between browsing sessions. They are activated each time you visit the website that created that particular cookie. For example, where a "persistent cookie" is used on a website to remember your log-in details, you will not need to enter those details each time you visit that website.
- Session cookies allow website operators to link the actions of a user during a browser session. A browser session starts when you open the browser window and finishes when you close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Some of the cookies listed below are those set by our own website when you visit [www.nmr.co.uk](http://www.nmr.co.uk) . However, we also have cookies on our website that are set by third parties – not National Milk Records Ltd or its group companies. For example, to enable us to have YouTube videos played through our website, YouTube places cookies on [www.nmr.co.uk](http://www.nmr.co.uk) (for more information about how YouTube uses cookies and what information they collect, visit [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/)).

### Strictly necessary

Strictly necessary cookies are essential to enable you to receive a service on a website. For example, cookies to operate online shopping baskets, do your internet banking or to comply with the law (e.g. such as to keep your information safe). We would not be able to operate our website without using the "strictly necessary" cookies listed below.

Cookie	Name	Purpose	Persistent/Session	More Information
	ci_session	Store encrypted session IDs	Persistent	
	ckfinder_path	Store path to document routes	Persistent	

### Performance

Performance cookies collect information about how visitors use a website, for instance, which pages visitors go to most often and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. Any information collected by these cookies is anonymous. We only use such information to improve our website.

Cookie	Name	Purpose	Persistent/Session	More Information
--------	------	---------	--------------------	------------------

Google Analytics	_utma _utmb _utmc _utmv _utmz	These cookies are used to collect anonymous information about how visitors use our site. We use the information to compile analytical reports which help us improve our website. The cookies collect information such as the number of visitors to our website, how they arrived there (e.g. directly from the internet or through linking from another website) and tracking which webpages they visited.	Persistent	<a href="#">Click here for an overview of privacy at Google</a>
------------------	-------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------	-----------------------------------------------------------------

## Functionality

Functionality cookies allow the website to remember choices you make (such as your log in details) and customised preference settings (e.g. text size). They also enable enhanced, more personal features, e.g. a website may be able to provide you with local weather reports or traffic news by using a cookie to remember which region you are in. These cookies are also used to provide services you have asked for such as watching a video. Information collected by "functionality" cookies may or may not be anonymised, but they cannot track your browsing activity on other websites.

Cookie	Name	Purpose	Persistent/Session	More Information
	PHPSESSID	Storing user ID information used in the data download section of the website	Session	

## Targeting

These cookies collect information about your browsing habits to make advertising relevant to you and your interests. These cookies collect the most information about users.

Cookie	Name	Purpose	Persistent/Session	More Information
None	None	None	None	None